

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Davy Woods Angela B. Woods Debtor(s) FREEDOM MORTGAGE CORPORATION Movant vs. Davy Woods Angela B. Woods Debtor(s) Kenneth E. West Esq. Trustee	CHAPTER 13 NO. 19-11128 ELF
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**MOTION OF FREEDOM MORTGAGE CORPORATION
TO APPROVE LOAN MODIFICATION**

1. The Movant is FREEDOM MORTGAGE CORPORATION.
2. Debtor(s) are the owner(s) of the premises 309 Ross Court , Wyncote, PA 19095, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$223,667.00 on the mortgaged premises that was executed on June 20, 2017. Said mortgage was recorded on June 23, 2017 in Instrument Number 2017045374. The Mortgage was subsequently assigned to Movant by way of Assignment of Mortgage recorded on November 27, 2018, in Instrument Number 2018081214 in Montgomery County.
4. Kenneth E. West Esq., is the Trustee appointed by the Court.
5. Debtor has applied and been approved for a Loan Modification Agreement with Movant. The Loan Modification is attached hereto as Exhibit "A".
6. Movant seeks Court approval of the Loan Modification by way of the within Motion.
7. Approval and recordation (if applicable) of the Loan Modification shall not constitute a violation of the automatic stay.
8. Upon Court approval of the within Motion, Movant shall file an Amended Proof of Claim to reflect the Loan Modification within thirty (30) days of the entry of any such Order.

WHEREFORE, Movant prays that an Order be entered approving the Loan Modification Agreement and allowing for the recordation of such agreement (if applicable).

/s/ Rebecca A. Solarz, Esquire

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